

THE LAW OFFICE OF
JAMES A. SCHIFF, ESQ.
261 MADISON AVENUE
12TH FL.
NEW YORK, NY 10016

JAMES A. SCHIFF

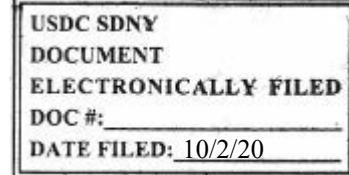
MEMBER OF THE NEW YORK
FEDERAL AND STATE BARS

P (212) 362-5600
F (212) 260-6918
jschiff@schiffesq.com

October 1, 2020

MOTION TO CONTINUE BAIL
VIA ECF

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007



**Re: *United States v. Osama Ahmed Abdellatif El Mokadem,
a/k/a "Armin De Goorte," 19 Cr. 646 (AJN)***

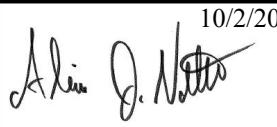
Dear Judge Nathan:

The defense, on the above-referenced matter, writes to request that the Court continue Defendant's current bail status.

As the Court is aware, one of the conditions of defendant's release included revisiting the need for bail if sentencing did not go forward within 90 days. (ECF No. 55). The defense respectfully requests a continuation of the defendant's current bail status for the viable reasons previously stated, and because the defendant has shown, by fully complying with Pretrial Services and the current bail conditions, that he is not likely to flee or pose a danger to the safety of the community.

The Government has advised that they do not oppose a continuation of Defendant's current bail status at this time.

The Defendant's current
bail status is hereby
continued until sentencing.
SO ORDERED.

10/2/20

SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

Respectfully,

/s/ James Schiff
Attorney for Defendant
(212) 378-4326

cc: Andrew Rohrbach, AUSA